



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

June 30, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – ETC Annual Reports and Certifications WC Docket No. 1458

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Pioneer Telephone Association, Inc. ("Pioneer"), Kansas, Study Area Code 411817, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 1458. Pioneer, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's June 17, 2015 Protective Order in WC Docket No. 1458. These attachments contain competitively sensitive data that Pioneer maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Pioneer is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.
- Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing.
- Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

REDACTED - FOR PUBLIC INSPECTION

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481. Pioneer requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Pioneer offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,



Tim Morrissey
President
314-605-9220
tmorrissey@fwainc.com

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of confidential submission)

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Catherine Moyer
<035> Contact Telephone Number: Number of the person identified in data line <030>	6203563211 ext.133
<039> Contact Email Address: Email of the person identified in data line <030>	catherine.moyer@pioncomm.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<110>	Has your company received its ETC certification from the FCC?	<input type="radio"/> (yes / no) <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing \$54.202(a) "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing \$ 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

411817KS112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Yes

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

[illegible]

(710) Broadband Price Offerings
Data Collection Form

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

www.pioncomm.net/lifeline-and-tribal-link-up-guidelines/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6205663211 ext.193
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioneercomm.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1))
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)(ii))
- <2011b> Attachment (47 CFR § 54.313(b)(1)(ii))

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<01>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext. 133
<039>	Contact Email Address - Email Address of person identified in data line <030>	Catherine.Moyer@comcast.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

(3018) If the response is no on line 3014, is your company audited? ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☒

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

411817KS3026.pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<01>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext. 133
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

Financial Data Summary

(3027) Revenue	19770668
(3028) Operating Expenses	16482614
(3029) Net Income	1082657
(3030) Telephone Plant in Service(TPIS)	3436014
(3031) Total Assets	34931927
(3032) Total Debt	6637500
(3033) Total Equity	16446863
(3034) Dividends	0

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PIONEER TEL ASSN INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2015
Printed name of Authorized Officer: Catherine Moyer	
Title or position of Authorized Officer: CEO and General Manager	
Telephone number of Authorized Officer: 6203563211 ext.133	
Study Area Code of Reporting Carrier: 411817	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	411817
<015> Study Area Name	PIONEER TEL ASSN INC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.133
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<220>		

[illegible]

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

1/1/2015
18.25

<701>	Residential Local Service Charge Effective Date
<702>	Single State-wide Residential Local Service Charge

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 411817
<015> Study Area Name PIONEER TEL ASSN INC
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data Catherine Moyer
<035> Contact Telephone Number - Number of person identified in data line <030> 6203563211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> catherine.moyer@pioncomm.net

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
KS	ALL EXCHANGES	39.95	0.0	39.95	6.0	1.0	0.0	Other, Basic DSL
KS	ALL EXCHANGES	103.95	0.0	103.95	12.0	1.0	0.0	Other, Enhanced (ADSL 2+) DSL
KS	ALL EXCHANGES	207.9	0.0	207.9	24.0	2.0	0.0	Other, Premium (Bonded) DSL
KS	ALL EXCHANGES	59.95	0.0	59.95	6.0	1.0	0.0	Other, Basic DSL -- Data Only
KS	ALL EXCHANGES	123.95	0.0	123.95	12.0	1.0	0.0	Other, Enhanced (ADSL 2+) DSL -- Data Only
KS	ALL EXCHANGES	247.9	0.0	247.9	24.0	2.0	0.0	Other, Premium (Bonded) DSL -- Data Only
KS	ULYSSES	39.95	0.0	39.95	25.0	5.0	0.0	Other, FTTP Asynchronous -- Basic
KS	ULYSSES	55.95	0.0	55.95	35.0	7.0	0.0	Other, FTTP Asynchronous -- Enhanced
KS	ULYSSES	89.95	0.0	89.95	50.0	10.0	0.0	Other, FTTP Asynchronous -- Premium
KS	ULYSSES	49.95	0.0	49.95	25.0	5.0	0.0	Other, FTTP Asynchronous -- Basic -- Data Only
KS	ULYSSES	65.95	0.0	65.95	35.0	7.0	0.0	Other, FTTP Asynchronous -- Enhanced -- Data Only
KS	ULYSSES	99.95	0.0	99.95	50.0	10.0	0.0	Other, FTTP Asynchronous -- Premium -- Data Only
KS	ULYSSES	99.95	0.0	99.95	25.0	25.0	0.0	Other, FTTP Synchronous -- Business Basic
KS	ULYSSES	199.95	0.0	199.95	35.0	35.0	0.0	Other, FTTP Synchronous -- Business Enhanced
KS	ULYSSES	349.95	0.0	349.95	50.0	50.0	0.0	Other, FTTP Synchronous -- Business Premium
KS	ULYSSES	109.95	0.0	109.95	25.0	25.0	0.0	Other, FTTP Synchronous -- Business Basic -- Data Only
KS	ULYSSES	209.95	0.0	209.95	35.0	35.0	0.0	Other, FTTP Synchronous -- Business Enhanced -- Data Only
KS	ULYSSES	359.95	0.0	359.95	50.0	50.0	0.0	Other, FTTP Synchronous -- Business Premium -- Data Only
KS	HUGOTON	39.95	0.0	39.95	10.0	1.0	0.0	Other, FTTP Asynchronous -- Basic
KS	HUGOTON	55.95	0.0	55.95	35.0	7.0	0.0	Other, FTTP Asynchronous -- Enhanced
KS	HUGOTON	89.95	0.0	89.95	50.0	10.0	0.0	Other, FTTP Asynchronous -- Premium

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
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[illegible]

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<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<810>	Reporting Carrier	Pioneer Telephone Association, Inc.
<811>	Holding Company	Pioneer Telephone Association, Inc.
<812>	Operating Company	Pioneer Telephone Association, Inc.

[illegible]

PIONEER TELEPHONE ASSOCIATION, INC.

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

(USAC DOCUMENT - 411817KS112.PDF)

Company Name: Pioneer Communications

Company Headquarters: Ulysses, KS

Narrative:



Universal Service Support (USF) Received



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PIONEER TELEPHONE ASSOCIATION, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 411817KS510.PDF)

The Pioneer Telephone Association, Inc.
d/b/a
Pioneer Communications

QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES
(For telephone, cable television and Internet service.)

1. **Available Customer Service Representatives to Assist Customers** – All calls received by Pioneer Communication during business hours, 8:00am to 5:00pm, are answered by a phone receptionist and transferred to an available customer service representative. Customer service representatives assist customers during this time. When the assigned customer service representatives are unable to answer calls, additional customer service help desk representatives are available to help answer phones.
2. **Provide a 24/7 Hour Customer Service Help Desk** – All calls are answered. Customer service help desk representatives assist customers from 12:00am to 11:59pm each day, except for Thanksgiving and Christmas. Issues, such as outages, requiring immediate attention are sent to the Pioneer Communications service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. Unresolved issues are reviewed the following work day. Call logs are reviewed daily by personnel.
3. **Online Bill Payments** – Payments made online are posted to the customer's account promptly and are viewable on the customer's account within 24 hours. Any problems are reported to the senior manager, and resolved as quickly as possible.
4. **Customer Satisfaction Surveys to All Current Subscribers** – Surveys with questions regarding the areas of services and Pioneer Communications personnel are made available to customers to rate the company. These surveys are distributed by phone calls and paper. Results are returned to the senior management team for interpretation and to allow proper follow-up to customer issues.
5. **Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities** – Customers receive their monthly bill on or before the 1st of each month. The bill is due on the 15th of the month. If the bill goes unpaid, a late notice is sent on the 16th with a second due date of eleven days after the 15th (due on the 26th) and are instructed to pay by that date to avoid suspension. We will suspend a customer for non-payment on the 4th of the following month. If the 4th falls on a Friday or holiday, the suspension occurs the next business day. (Customers in danger of being suspended also receive a phone call from the customer service representatives before the 4th.) Customers with extenuating circumstances are allowed to arrange bill payment plans over a period of time to avoid being suspended.
6. **Ensure That All New Service Installation Orders Are Fulfilled Promptly** – At the time of install, a customer is given information about when the installation will occur, depending on the current installation schedule. If outside plant is already in place, the installation is

completed customers' earliest convenience; if outside plant is in not in place, the installation is completed once the plant has been built.

7. **Minimize Customer Downtime for Services** – All trouble reports are handled the same day the report is received, including after normal working hours and on the weekend.
8. **Proactively Monitoring in Case of Major Service Outages** – Service technicians will be made aware of outages affecting customers within thirty minutes. It is the goal of Pioneer Communications to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from outside.

CUSTOMER PRIVACY

Company Confidential Information Policy – Pioneer Communications has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. Employees are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."

Company CPNI Policy – Pioneer Communications also has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that failure to protect this information result in disciplinary action up to and including discharge. As a part of this policy, Pioneer Communications has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

PIONEER TELEPHONE ASSOCIATION, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 411817KS610.PDF)

PIONEER TELEPHONE ASSOCIATION, INC EMERGENCY SITUATION FUNCTIONALITY

AVAILABILITY OF BACK-UP POWER

Pioneer Telephone Association, Inc. owns and operates fifteen central office locations within the boundaries of its serving area. Each central office contains a diesel, natural gas or propane generation system and an automatic transfer switch. These systems are capable of providing sufficient back-up power for rectifiers, lighting and HVAC for lengthy outages of commercial power. Each generation system is inspected and manually exercised monthly by Pioneer personnel. Pioneer also services the generators annually and makes minor system repairs. Major system repairs are completed by manufacturer-certified technicians.

Remote subscriber terminals contain back-up battery systems to maintain service during commercial power outages. The batteries and power systems are periodically maintained and tested by qualified technicians. During extended commercial power outages, portable AC generators are available for use at sensitive or high-traffic terminals.

For fiber-to-the-home (FTTH) services, Optical Network Terminations at the customer premises are paired with battery back-up systems that are designed to sustain landline service during commercial power outages. For extended power outages, batteries are available for delivery to critical locations. System and battery statuses are monitored by the manufacturer's network monitoring software.

TRAFFIC ROUTING

Voice traffic between Pioneer's host central office switch and remote central office switches is delivered across an OC-48 SONET ring. This network utilizes two-fiber Bidirectional Line Switched Ring (BLSR) technology to allow continued connectivity in the event of a transport failure.

Voice traffic between Pioneer's host central office switch and upstream tandem switch is also transported across the Pioneer SONET ring. At the handoff point, two redundant OC-12 connections are connected between Pioneer's transport node and the upstream carrier.

NETWORK CAPACITY

Voice trunks and switching components are periodically monitored by Pioneer to ensure channel availability. Upstream carriers connected to Pioneer's network also perform their own utilization testing. The upstream carriers will increase or reduce channel capacity as necessary.

PIONEER TELEPHONE ASSOCIATION, INC.

VOICE SERVICES RATE COMPARABILITY

(USAC DOCUMENT - 411817KS1010.PDF)

Voice Services Rate Comparability

Pioneer Communications

In compliance with the 54.313 Rules, Pioneer Communications must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2015 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the weighted average unlimited local rate is \$21.22. USAC Guidelines provide that two standard deviations above the \$21.22 would be \$47.48.

The rates for Pioneer Communications shown on the Voice Pricing Form (0700) are below \$47.48.

Consequently, Pioneer Communications meets the above mentioned requirement.

PIONEER TELEPHONE ASSOCIATION, INC.

FINANCIAL STATEMENTS

(USAC DOCUMENT - 411817KS3026.PDF)



REPORT OF INDEPENDENT AUDITORS

Board of Directors
The Pioneer Telephone Association, Inc.

Report on Financial Statements

We have audited the accompanying consolidated financial statements of The Pioneer Telephone Association, Inc. and its subsidiaries, which comprise the consolidated balance sheets as of December 31, 2014 and 2013, and the related consolidated statements of income, comprehensive income, members' equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

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REPORT OF INDEPENDENT AUDITORS
(continued)

We believe that the audit evidence obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of The Pioneer Telephone Association, Inc. and its subsidiaries as of December 31, 2014 and 2013, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLP

Spokane, Washington
May 14, 2015

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

Part A. Balance Sheet

	Balance Prior Year	Balance End of Period
Assets		
Current Assets		
1. Cash and equivalents		
2. Cash - RUS construction fund		
3. Affiliates		
a. Telecom accounts receivable		
b. Other accounts receivable		
c. Notes receivable		
4. Nonaffiliates		
a. Telecom accounts receivable		
b. Other accounts receivable		
c. Notes receivable		
5. Interest and dividends receivable		
6. Materials - regulated		
7. Materials - nonregulated		
8. Prepayments		
9. Other current assets		
10. Total current assets (1 thru 9)		
Noncurrent assets		
11. Investment in affiliated companies		
a. Rural development		
b. Nonrural development		
12. Other investments		
a. Rural development		
b. Nonrural development		
13. Nonregulated investments		
14. Other noncurrent assets		
15. Deferred charges		
16. Jurisdictional differences		
17. Total noncurrent assets (11 thru 16)		
Property, Plant, and Equipment		
18. Telecom plant in service		
19. Property held for future use		
20. Plant under construction		
21. Plant adj, nonop, & goodwill		
22. Less accumulated depreciation		
23. Net plant (18 thru 21 less 22)		
24. Total assets (10+17+23)		

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

	Balance Prior Year	Balance End of Period
Liabilities and Stockholders' Equity		
Current Liabilities		
25. Accounts payable		
26. Notes payable		
27. Advance billing and payments		
28. Customer deposits		
29. Current maturities l/t debt		
30. Current maturities l/t debt - rur dev		
31. Current maturities - capital lease		
32. Income taxes accrued		
33. Other taxes accrued		
34. Other current liabilities		
35. Total current liabilities (25 thru 34)		
Long-term debt		
36. Funded debt - RUS notes		
37. Funded debt - RTB notes		
38. Funded debt - FFB notes		
39. Funded debt - Other		
40. Funded debt - rural deb		
41. Premium (discount) on l/t debt		
42. Reacquired debt		
43. Obligations under capital lease		
44. Adv from affiliated companies		
45. Other long-term debt		
46. Total long-term debt		
Other liabilities and deferred credits		
47. Other long-term liabilities		
48. Other deferred credits		
49. Other jurisdictional differences		
50. Total other liabilities and deferred credits(47 thru 49)		
Equity		
51. Capital stock		
52. Additional paid in capital		
53. Treasury stock		
54. Memberships and cap certificates		
55. Other capital		
56. Patronage capital credits		
57. Retained earnings or margins		
58. Total equity (51 thru 57)		
59. Total liabilities and equity (35+46+50+58)		

PIONEER TELEPHONE ASSOCIATION, INC.
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

Part B. Statements of Income and Retained Earnings or Margins

1. Local network services revenues
2. Network access revenues
3. Long distance network services revenues
4. Carrier billing and collection revenues
5. Miscellaneous revenues
6. Uncollectible revenues
7. Net operating revenues (1 thru 5 less 6)
8. Plant specific operations expense
9. Plant nonspecific operations expense
10. Depreciation expense
11. Amortization expense
12. Customer operations expense
13. Corporate operations expense
14. Total operating expenses (8 thru 13)
15. Operating income or margins (7 less 14)
16. Other operating income and expenses
17. State and local taxes
18. Federal income taxes
19. Other taxes
20. Total operating taxes (17+18+19)
21. Net operating income or margins (15+16-20)
22. Interest on funded debt
23. Interest expense capital leases
24. Other interest expense
25. Allowance for funds used during construction
26. Total fixed charges (22+23+24-25)
27. Nonoperating net income
28. Extraordinary items
29. Jurisdictional differences
30. Nonregulated net income
31. Total net income or margins
32. Total taxes based on income
33. Retained earnings or margins beginning of year
34. Miscellaneous credits year-to-date
35. Dividends declared (common)
36. Dividends declared (preferred)
37. Other debits year-to-date
38. Transfers to patronage capital
39. Retained earnings or margins end of period
40. Patronage capital beginning of year
41. Transfers to patronage capital
42. Patronage capital credits retired
43. Patronage capital end of year

411817ks3026

(3005c) Operating Report for Privately-Held Rate of Return Carriers
Cash Flow - Data Collection Form

Page 3 of 3

FCC Form 481
OMB Control No. 3060-0986
OMB Control No. 3060-0819
April 2014

<010> Study Area Code 411817
 <015> Study Area Name PIONEER TELEPHONE ASSOCIATION, INC.
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data CATHERINE MOYER
 <035> Contact Telephone Number - Number of person identified in data line <030> 620.356.3211
 <039> Contact Email Address - Email Address of person identified in data line <030> CATHERINE.MOYER@PIONCOMM.NET

PART C. STATEMENTS OF CASH FLOWS	
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
CASH FLOWS FROM OPERATING ACTIVITIES	
2. Net Income	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain)	
Changes in Operating Assets and Liabilities	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain)	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain)	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	

REDACTED - FOR PUBLIC INSPECTION